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Attorneys for Intervenor

CALIFORNIA REPUBLICAN PARTY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

VINZENZ J. KOLLER, an individual and
Presidential Elector,

Plaintiff,

vs.

JERRY BROWN, in his official capacity as
Governor for the State of California;
KAMALA HARRIS, in her official capacity as
Attorney General for the State of California;
ALEX PADILL, in his official capacity as
Secretary of State for the state of California;
and DOES 1-10,

Defendants.

Case No. 5:16-cv-07069

**DECLARATION OF CHARLES H. BELL,
JR., IN SUPPORT OF MOTION OF
CALIFORNIA REPUBLICAN PARTY TO
INTERVENE AND DECLARATION OF
NOTICE PURSUANT TO STANDING
ORDER REGARDING CASE
MANAGEMENT**

I, Charles H. Bell, Jr., declare:

1. I am counsel for Proposed Intervenor CALIFORNIA REPUBLICAN PARTY in this matter. I am a member of the California State Bar and am admitted to practice before this California Court. I make this declaration of my personal knowledge of the facts stated herein and could and would competently testify to them if called to do so.

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1 2. On December 12, 2016, at approximately 5:40 p.m., I placed a call to Melody A.
2 Kramer, counsel-of-record for Plaintiff, VINZENZ J. KOLLER in the above-captioned
3 proceeding, at the number set forth on the caption of her pleading, 855-835-5520. I left a message
4 identifying myself, and the purpose of the call, to seek consent or non-opposition to filing of
5 motions in intervention on behalf of the CALIFORNIA REPUBLICAN PARTY and also on
6 behalf of DONALD J. TRUMP and DONALD TRUMP FOR PRESIDENT, INC. (the "Trump
7 Parties"), whose counsel had authorized me to make the request of Ms. Kramer on behalf of their
8 clients as well. I left my office number, 916-442-7757 and my cellphone number 916-215-7757,
9 and requested she call me to respond.

10 3. On December 12, 2016, at approximately 7:54 p.m., Ms. Kramer returned my call
11 and left a message stating that she understood the request as stated above, and that her client had
12 no opposition to intervention.

13 4. On December 13, 2016, I sent an e-mail communication to Ms. Kramer confirming
14 her telephone message and asked her to advise me immediately if I had misstated her voicemail
15 message. To date, I have not received any response to that e-mail message.

16 5. On December 12, 2016, at approximately 5:30 p.m., I placed a call to Douglas
17 Woods, Senior Assistant Attorney General, at his office number 916-324-4663 in Sacramento. I
18 made an identical request to Mr. Woods concerning his clients' consent or non-opposition to
19 intervention on behalf of my client and the Trump Parties. Mr. Woods confirmed that on behalf of
20 his client, KAMALA HARRIS, Attorney General, she would not oppose intervention by my client
21 and the Trump Parties. Mr. Woods stated that he had not yet confirmed whether the Attorney
22 General would represent Defendants Governor JERRY BROWN and Secretary of State ALEX
23 PADILLA in this matter.

24 6. On December 13, 2016, at approximately 9:45 a.m., I called Douglas Woods and
25 left a voicemail message asking him to confirm whether or not the Attorney General had
26 confirmed that she would represent Defendants Governor JERRY BROWN and Secretary of State
27 ALEX PADILLA in this matter. At about 12:00 p.m., Mr. Woods called me and confirmed that the
28 Attorney General has yet to obtain authority to represent the Governor or the Secretary of State.

7. On December 13, 2016, at approximately 11:30 a.m., I conferred with opposing counsel to determine that the proposed hearing date will not cause undue prejudice pursuant to Standing Order Regarding Case Management in Civil Cases, p. 1:19-21,

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and of my personal knowledge and that this Declaration was executed this 13th day of December, 2016 at Sacramento, California.

Dated: December 13, 2016.

/s/

CHARLES H. BELL, JR.

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2016, I electronically filed a true and correct copy of the foregoing document entitled: DECLARATION OF CHARLES H. BELL, JR. with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel:

Counsel

Party Represented

Andrew John Dhuey
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Plaintiff VINZENZ J. KOLLAR an
individual and Presidential Elector

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Tel: (855) 835-5520

Dated: December 13, 2016.

BELL, McANDREWS & HILTACHK, LLP

/s/

BY: _____

CHARLES H. BELL, JR.
BRIAN T. HILDRETH
TERRY J. MARTIN

Attorneys for Intervenor
CALIFORNIA REPUBLICAN PARTY